

IV. REMARKS

1. Claims 1-12 remain in the application. Claim 11 has been amended.
2. The specification has been amended to add headings in compliance with US practice.
3. The Abstract of the Disclosure has been amended to comply with MPEP 608.01(b).
4. Claim 11 has been amended to correct its dependency.

The amendments to the claims are not limiting, are not made for reasons related to patentability, and do not raise issues of estoppel.

5. Applicants respectfully submit that claims 1, 5-9, 11, and 12 are not anticipated by Green (WO 98/10571).

Green fails to disclose or suggest that the user interface is arranged to be replaceable by placing a replacement cover in a detachable manner in connection with the housing as recited by claim 1.

Green also fails to disclose or suggest that the user interface is changed by placing a replacement cover in a detachable manner in connection with the housing as recited by claim 9.

Both claims recite a means for providing user interface functions comprising at least a first keypad and a display, and recite that user interface is arranged to be replaceable, or that the user interface is changed.

In contrast, Green only discloses placing an adaptor on the keypad of a mobile phone without replacing the user interface. Green has no references to a display element and only discloses a keypad adaptor placed onto an existing keypad. Furthermore, the position of the display also remains the same all the time.

The starting point for the present application is that users can replace the user interface of the phone according to their needs; for example, in a game application one can use a user interface having only a few keys, which makes, for example, playing an action game easier. When replacing the user interface, it is also possible to change the position of the display, so that the display can be situated, for example, in the middle, and the game control keys on the sides (see Fig. 6d and 6e of the present application). The main difference between the solution according to the present invention and Green is that in the present invention the whole interface is replaced substantially in parallel to the second part, onto or in the place of the second part.

This is different from Green, which discloses an adaptor that is placed on a keypad. Green attempts to reduce the number of the keys to be used, which makes the phone easier to use and reduces the number of mis-keyings (page 2, lines 4 - 10). Green also discloses that the user can have some numbers to choose from, while the other numbers are stored in the memory and the user can scroll these other numbers from the memory (page 3, lines 7 - 15).

At least for these reasons, independent claims 1 and 9, and dependent claims 5-8, 11 and 12 are not anticipated by Green.

6. Applicants respectfully submit that claims 2-4, and 10 are patentable over the combination of Green in view of Fuhrmann et al. (WO 97/32423, "Fuhrmann").

6.1 Claims 2-4 and 10 depend from claims 1 or 9. The combination of Green and Fuhrmann fails to disclose or suggest that the user interface is arranged to be replaceable by placing a replacement cover in a detachable manner in connection with the housing as recited by claim 1. The combination of Green and Fuhrmann also fails to disclose or suggest that the user interface is changed by placing a replacement cover in a detachable manner in connection with the housing as recited by claim 9.

Fuhrmann, commonly assigned, and cited in the present application on page 8, lines 18-19, and also cited in the IDS filed therewith, relates to replacement covers. Fuhrmann discloses that the user can replace the cover of the phone with a different cover, while the functions remain the same. In Fuhrmann it is assumed that the old cover is detached and substituted with another one.

According to the Examiner, it would be obvious to one having ordinary skill in the art to combine Green and Fuhrmann and arrive at the solution according to the present invention. Applicants disagree and submit that one having ordinary skill in the art would end up with a solution comprising a replacement cover with a different key configuration therein. Contrary to the Examiner's arguments, in the Fuhrmann publication, the display or the keypad properties are not replaced, only the cover itself with openings for the display and the keypad. Green only presents key adaptors related to phone functions, but

it does not discuss, for example, changing the places of the keypad and the display.

6.2 Furthermore, Applicant respectfully submits that there is no suggestion or motivation to combine Green and Fuhrmann to reach the present invention. Applicant finds no suggestion in the nature of the problem to be solved, in the references themselves, or in the knowledge generally available to one of ordinary skill in the art to modify or combine the references.

Green is directed to facilitating use of a keypad. This is in contrast to Fuhrmann which is directed to modifying the appearance of an electronic device. Thus, the nature of the problems to be solved by the references is notably different and does not suggest such a combination. Further, there is no suggestion in either reference of such a combination at least because the references are directed to diverse subject matter. Green discloses an adapter with large keys that is placed over a keypad while Fuhrmann discloses a replaceable housing. Still further, starting with the keypad adapter of Green, one skilled in the art would not look to a reference that is directed to replacing a housing, as in Fuhrmann, in order to arrive at the present invention.


At least for these reasons, claims 2-4, and 10 are patentable over the combination of Green and Fuhrmann.

For all of the foregoing reasons, it is respectfully submitted that all of the claims now present in the application are clearly novel and patentable over the prior art of record, and are in proper form for allowance. Accordingly, favorable reconsideration and allowance is respectfully requested. Should

any unresolved issues remain, the Examiner is invited to call Applicants' attorney at the telephone number indicated below.

The Commissioner is hereby authorized to charge payment for any fees associated with this communication or credit any over payment to Deposit Account No. 16-1350.

Respectfully submitted,


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24 June 2004
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